

J. Kathleen Bond (admitted *pro hac vice*)
Samuel A. Butler (admitted *pro hac vice*)
KELLER AND HECKMAN LLP
1001 G Street, NW, Suite 500 West
Washington, DC 20001
Tel: (202) 434-4100
Fax: (202) 434-4646
Email: bondk@khlaw.com
Email: butler@khlaw.com

Rohit A. Sabinis, State Bar No. 221465
KELLER AND HECKMAN LLP
Three Embarcadero Center, Suite 1420
San Francisco, CA 94111
Tel: (415) 948-2807
Fax: (415) 948-2808
Email: sabnis@khlaw.com

*Attorneys for Defendant
Gravity Defyer Medical Technology Corp.*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA—OAKLAND**

CECELIA MOSHER-CLARK,
Plaintiff,
v.
GRAVITY DEFYER MEDICAL
TECHNOLOGY CORP.,
Defendant.

Case No. 4:22-cv-5288-HSG

Hon. Haywood S. Gilliam, Jr.

**STIPULATION TO EXTEND
ADR DEADLINE; ORDER**

Pursuant to Civil L.R. 7-11, Defendant Gravity Defyer Medical Technology Corporation and Plaintiff Cecelia Mosher-Clark hereby stipulate to and request that the Court enter the accompanying proposed order extending the deadline for them to participate in private mediation for one additional month, until April 22, 2024.

In support of this request, the parties state that, in its December 21, 2022 Stipulation and Order Selecting ADR Process [Dkt. 26], the Court ordered the parties to participate in private mediation within 90 days of the filing of the Answer in this lawsuit. Defendants filed their Answer [Dkt. 41] on September 22, 2023, so that the deadline established by the Stipulation and Order initially fell on

1 December 22, 2023. This deadline has been previously extended three times by orders of the Court
2 issued December 19, 2023, January 23, 2024, and February 22, 2024.

3 The parties have executed an agreement pursuant to which they anticipate filing a stipulation
4 of dismissal in the first week of April. Accordingly, the parties request that the Court extend once
5 again its deadline for them to engage in private mediation.

6 **Civil L.R. 5-1(h)(3) Attestation**

7 I, Samuel A. Butler, attest that concurrence in the filing of this document has been obtained
8 from the other signatory.

9
10 Dated: March 21, 2024

Respectfully submitted,

11
12 KELLER AND HECKMAN, LLP

13
14 */s/ Samuel A. Butler* _____
Samuel A. Butler

15
16 *Attorney for Defendant*
Gravity Defyer Medical Technology Corp.

17
18 BURSOR & FISHER, P.A.

19
20 */s/ L. Timothy Fisher* _____
L. Timothy Fisher

21
22 *Attorney for Plaintiff Cecelia Mosher-Clark*

23

24

25

26

27

28

1

ORDER

2

The Court, having considered the parties' Stipulation to Extend ADR Deadline, and good
3 cause appearing, hereby orders as follows:

4

The parties shall participate in private mediation by April 22, 2024.

5

PURSUANT TO STIPULATION, IT IS SO ORDERED.

6

Dated: 3/22/2024

7



HON. HAYWOOD S. GILLIAM, JR.

United States District Judge

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28